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Angela Demahy

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From: Ralph Caruso <rxo@yahoo.com>
Sent: Wednesday, August 30, 2017 10:39 AM
To: Aaron Goldschmidt; David Sieradzki
Subject: Telecommunications infrastructure in a Floodplain - WT Docket No. 17-79; FCC 17-38
Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment

Federal Communications Commission
Office of the Secretary

This is a late-filed comment regarding the notice of proposed rulemaking.

In light of the numerous failures of wireless telecommunications infrastructure in Houston Texas this past week, as a result of the flooding caused by Hurricane Harvey, I believe that it is important for the FCC to strengthen, not reduce, its regulatory technical requirements for construction in a floodplain. The concerns expressed in EO-11988 have been confirmed by this event, and it appears that the engineering standards adopted by telecommunications companies to elevate their towers 1 foot above the Design Basis Flood (the "100 year flood level") are inadequate. Telecommunications facilities have become "critical infrastructure", which should require them to be protected against the 500 year flood. The reports that are being published daily by the FCC show the loss of over 80% of the wireless telecommunications infrastructure in several Texas counties. This would be a disaster in Florida.

Perhaps some aspects of the EA process can be simplified. But flood protection is not one of them. In addition, the FCC counts on local governments to ensure that the telecommunications companies construct their facilities properly, but local governments often simply accept assertions of the companies that they have followed the standards established by trade organizations for construction in a floodplain. The companies should be required to demonstrate that local governments have actually reviewed and approved the detailed engineering analyses for floodplain siting loads, and that they comply fully with the standards promulgated by FEMA and by state building codes for siting, design, and construction. Independent analyses should be required for construction of critical telecommunications facilities in floodplains, especially in floodprone areas where hurricanes are common.

Sincerely,

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